

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

DAVID A. DOWS ,	:	CIVIL ACTION
Plaintiff	:	
	:	
v.	:	NO. 04-341 Erie
	:	
KATHERINE E. HOLTZINGER	:	Judge McLaughlin
CONNER, ESQ., Chairman	:	
PENNSYLVANIA CIVIL SERVICE	:	
COMMISSION and JOHN DOE ,	:	
Defendants	:	JURY TRIAL DEMANDED

Part Five, Deposition of Karlos M. Deltoro, pages one hundred and one through one hundred and forty two inclusive

1 eventually lead you to civil service employment.

2 So from a practical standpoint, it makes
3 sense to tell this person, "Hey, if you are interested
4 in civil service employment, this is what you ought to
5 start looking into now."

6 But they do have that other option
7 available to them in the future.

8 Q On the intern list, people can say they are
9 interested in working in any number of counties; is
10 that right?

11 A That's correct.

12 Q Including all?

13 A Well, no, actually, let me clarify that.

14 Anything that you apply for, in terms of
15 civil service work, you need in some way, shape or
16 form, to do a civil service application, whether it's
17 electronically, or whether it's on paper. On the
18 civil service application, you can list up to ten
19 counties where you would be interested and available
20 to work.

21 Now, that's flexible, so at some point,
22 let's say you get your results of your test, and let's
23 say you are waiting for months on end, and you are not
24 seeing any activity in the counties in which you made
25 yourself available, you could always call, there is

1 flexibility to take counties out, add additional
2 counties.

3 But there is no option to be considered
4 throughout Pennsylvania, at this point.

5 Q So, would it be correct, that even interns,
6 initially, can only indicate a maximum of ten counties
7 where he or she would wish to work?

8 A That's correct.

9 Q And then if things aren't working out, the
10 individual can change which counties are chosen, or
11 add more counties?

12 A For any civil service title, that's true,
13 yes. You can call --

14 Q So, I am not asking the question well.
15 Can they add, so they then are expressing
16 interest in more than ten counties?

17 A No.

18 Q Or are they always confined to a maximum of
19 ten?

20 A They are always confined to a maximum of
21 ten.

22 Q So they are substituting?

23 A Correct.

24 And if they -- if they only listed let's
25 say three or four initially, thinking, that, "Oh,

1 something is going to happen in those counties," and
2 they decide later they are going to need to add two or
3 three more, they can always add counties later.

4 Q Now, it is my understanding that the county
5 caseworker list allowed the hiring authority to give a
6 preference to people who live in that county. Is that
7 correct?

8 A That's correct. That's true of any county
9 job.

10 Q Is it true, with the intern jobs, can they
11 give a preference to interns who already live in the
12 county?

13 A That's my understanding. Yes.

14 Q As to intern lists, does veterans
15 preference apply to it?

16 A To my knowledge, yes, it does.

17 Q Have you ever seen any work up, that shows
18 you the numbers of people who applied to both the
19 intern list for caseworker, and the county caseworker
20 list?

21 A You mean of the same individuals who
22 applied for both?

23 Q Exactly. Do people apply for both?

24 A Yes.

25 Q Get on both?

1 A I honestly don't know.

2 Q Based on your observations, when did most
3 of the people, who qualify for the internship
4 programs, take it, in the junior year, senior year,
5 the summer in between?

6 How does it typically fall for people, the
7 majority of people?

8 A Well, let me answer: I don't know when
9 specific individuals apply.

10 We tell people that they can apply any
11 time, provided that the exam is open. But they --
12 they would be wasting their time if they applied in
13 their senior year, because again they would not be
14 eligible for it.

15 So we try to counsel them, as soon as we
16 know that they are in their junior year, we emphasize
17 to them, "This is the time you need to apply, if you
18 want to qualify for this program."

19 Q Now, the description of the intern list
20 indicates that people may be taking their internship
21 at a six month block, or two three-month blocks.

22 A That's correct.

23 Q Is there a preponderance; most people do it
24 in the six-month method, or is it broken into the
25 three-month method?

1 A I don't know that. I do know that the
2 counties tend to exercise a great degree of
3 flexibility with that.

4 Q Now, Exhibit 7, which is that county social
5 caseworker list, indicates that if an individual uses
6 the three-month method, two three-month blocks, of
7 taking internship --

8 A Yes.

9 Q -- that he or she will be allowed, if
10 necessary, to finish it out after they graduate, that
11 second three-month period can occur after graduation;
12 is that right?

13 A That's my understanding.

14 Q Do many people do that, as a percentage?

15 A I don't know.

16 Q Do you know if that information would be
17 available; does the Commission have records that would
18 reflect when people actually participate in
19 internships?

20 A I don't know that either, actually. I
21 don't know if we require anything that specific from
22 the agencies on that.

23 I honestly don't know.

24 Q Now, in this question, and the next one or
25 two, assume our hypothetical Mary college student,

1 M-a-r-y.

2 A Okay.

3 Q And Mary wants to be a county social
4 worker. And, she has decided to pursue the intern
5 approach, and she made that decision in her junior
6 year, so she is able to pursue it, either in the
7 six-month method, on the two three-month method, she
8 has time, no matter which way she does it.

9 A Okay.

10 Q She fills out everything in your
11 application packet, and mails it into civil service.

12 Would it be correct that in the ordinary
13 course of business, an evaluator will take that
14 packet, in a rolling sort of way, take a look at it,
15 and according to the evaluation instruments, give it a
16 grade?

17 A A score, yes.

18 Q A score.

19 And, now the person hasn't completed her
20 internship, Mary is still in her internship, and Mary
21 hasn't graduated from college.

22 So, she doesn't meet all of the
23 qualifications yet, to be on the intern list; is that
24 correct?

25 A Okay. Let me backtrack a bit.

1 She has applied, Mary has applied, she gets
2 a score.

3 Q She sent in all of her paperwork to the
4 Civil Service Commission, and it has been reviewed.

5 She is in her internship at a college.

6 A Okay. So she has been -- you are saying,
7 she has been hired by -- oh, in her internship.

8 Q She is in her internship.

9 A What internship, though, would that be?

10 Q Well, that's -- therein lies the question.

11 When is an individual -- to be hired, so as
12 to move directly into a caseworker 2 later, an
13 individual has to have completed all of the
14 requirements to be an intern, and to have carried
15 through the internship; isn't that right?

16 A Right. Let me take that in two segments.

17 Q Please. Feel free to just talk to us about
18 Mary.

19 A Okay.

20 The first thing is that in order for her to
21 qualify for this intern program, the county social
22 caseworker program, before she could be hired by the
23 county, she would have to meet the minimum
24 requirements of this job, as you would for any civil
25 service job.

1 So if she -- I just wanted to clarify, you
2 had given a hypothetical, if she didn't meet the
3 requirements, well, we are talking about two different
4 things, we are talking about the caseworker 2, and
5 this, she has to meet the qualifications of this, so
6 she -- let's say she is, right now, in her first
7 semester of her junior year. She technically hasn't
8 met that requirement yet, because she has to have
9 completed the first semester of her junior year, which
10 is about 75 credits worth.

11 So if, by the time she has applied, and
12 even gotten a score back, if she never completes that
13 first semester of her junior year, she could never be
14 appointed as an intern, because she wouldn't meet the
15 minimum experience and training requirements of the
16 intern.

17 Q Agree. So back to Mary.

18 A Okay.

19 Q Now let's assume that she successfully
20 completed her first semester as a junior -- a senior,
21 rather.

22 A Okay.

23 Q She now fills out all of her paperwork, she
24 is participating in a program with the county Office
25 of Children and Youth.

1 A In this program, the county social casework
2 intern.

3 Q Well, therein --

4 A Okay.

5 Q You see, we have to break this circle at
6 some point.

7 A Okay.

8 Q Because she has -- no one has completed all
9 of their requirements under Deposition Exhibit -- 7, I
10 believe it is.

11 A 7 is correct.

12 Q -- 7, until they have done a number of
13 things.

14 So, the individual has to fill out an
15 application, and is supposed to meet these other
16 requirements.

17 The test, as we have talked about, very
18 much, is the examination packet.

19 So that's graded.

20 And then, at that point, we have the
21 individual qualifies to be on a list. Is that right?

22 A Correct.

23 Q But being on that list, by itself, just
24 means that you are on a track to eventually have a
25 job. It doesn't mean you have a job.

1 A That's correct.

2 Q Meanwhile, you are at OCY, of some county.

3 A Okay.

4 Q And you are carrying on what amounts to
5 training, for which you are paid, but you are paid
6 by -- well, you are not paid by the civil service,
7 certainly, number one?

8 A Right.

9 Q And whoever is paying you, you are not
10 qualified to be a caseworker 1, 2 or 3, you are a
11 county social caseworker intern.

12 A Okay.

13 Q Is that correct? Mary is still a senior.

14 A I guess what -- let me -- I guess what I am
15 saying is, is your question regarding meeting the
16 qualifications of county caseworker assuming that she
17 is participating in this program, or is --

18 Q Let us assume Mary is participating in the
19 county social caseworker intern program.

20 A Okay So she is hired now.

21 Q Absolutely.

22 A Okay.

23 Q And she is working for them.

24 A Okay.

25 Q And she is working toward getting at

1 least -- what is it, 975 hours, more or less?

2 A That's correct.

3 Q Or more time.

4 While she is doing that, in your opinion,
5 is she a county social caseworker intern? Or she will
6 only be one when she has completed that 975 hours?

7 A No, no, no, no.

8 She is a county social casework intern,
9 once she has taken the test --

10 Q Right.

11 A -- gotten on the list, found to be within
12 the reach on that list, based on all of the rules you
13 were describing, officially appointed by the agency,
14 under civil service rules, as a county social casework
15 intern, with a particular effective date, and from
16 that point on the agency is responsible to count the
17 number of hours, keep track of the number of hours, be
18 it the sixth month, two three-month, however they do
19 that.

20 When she completes the 975 hours, which
21 amounts to roughly six months, in effect, that works
22 out to be a probationary period type of period.

23 Well, that's kind of a stupid way to say
24 it. It is a probationary period, that will qualify
25 her for the county caseworker 2.

1 And that's in accordance with the documents
2 that you gave, I believe you have shown me earlier.

3 One of the minimum experience and training
4 requirements, for the county social casework intern,
5 actually is -- and I am referencing Exhibit 22 -- no,
6 I'm sorry.

7 Q Exhibit 8, that will help.

8 A 8. No -- yeah, 8 is correct.

9 Exhibit 8, page 3 of 5 on the county
10 caseworker 2, one of the minimum training and
11 experience requirements is successful completion of
12 the county social casework intern program.

13 So once she completes those 975 hours, she
14 would be eligible for county caseworker 2.

15 Q Would she also have to graduate, to be
16 eligible?

17 A Yes, she has to meet all of her -- she has
18 to meet any of the requirements that are stipulated in
19 the original application, county social casework
20 intern, which would be that she is enrolled as a
21 full-time student in a bachelor's degree program, and
22 in order to be considered having successfully met this
23 requirement, she would have had to have completed the
24 six months.

25 Q Now, let's stick with Mary, and assume she

1 is very traditional, she is going to graduate June 1st
2 of her senior year.

3 A Okay.

4 Q She is finishing at least the minimum
5 number of hours, at least 975.

6 A Okay.

7 Q Her supervisors feel her work is adequate
8 or better.

9 A Okay.

10 Q So that is not going to be an issue.

11 She will graduate on Sunday, June 1st, so
12 she has got her diploma.

13 And at that point, what notification does
14 the civil service receive, that an individual has
15 completed her 975 or more hours, of work?

16 A I don't know.

17 Q And what notification does the Civil
18 Service Commission receive, to show that someone has
19 officially graduated from college?

20 A I don't know that, either.

21 Q Now, let's assume that in May, May 1st,
22 Mary knows everything is going well, and she wants to
23 be a county social worker 2.

24 A Okay.

25 Q And we will assume that she filled out all

1 of the right civil service paperwork for that, sent it
2 in, in a timely -- you know, before June 1, so it's
3 there, ready to go.

4 A Okay.

5 Q And we will assume that whatever proof is
6 needed, you and I don't know what it is, but whatever
7 shows that she finished her internship time --

8 A Uh-huh.

9 Q -- and performed satisfactorily, and that
10 she graduated, are now all in the civil service
11 office, on June 7th.

12 A Okay.

13 Q When can the county, where she works, has
14 been working, ask for a county caseworker 2 list, and
15 she will be on it?

16 How much time is going to go by, before she
17 will be on there?

18 A I honestly can't speak to that. I don't
19 know.

20 Q Until she has met every requirement to be
21 on the county caseworker 2 list, Roman numeral II,
22 will the Commission issue -- and if a list is
23 requested, by her home county, will the Commission put
24 her name on that list, until she has met every
25 qualification?

1 A I don't know.

2 Q Do you have any knowledge that any sort of
3 interim, or provisional list goes out, of people who
4 have been in -- who are qualified, as under the intern
5 program, indicating that they are tracked, or expected
6 to be qualified as intern 2's -- I'm sorry, as
7 caseworker 2's?

8 A I don't know that, either.

9 Q Who would know these things that we have
10 just been talking about?

11 A When it comes specifically to
12 certifications, I would think that someone in our
13 Bureau of Technical Information Systems, would be the
14 most appropriate to ask.

15 Q Do you know who the head of that unit is?

16 A That's Steve Shartle.

17 Q Now, would it be correct, that with the
18 written test procedures, the Commission -- until a
19 test has been taken and graded, that the Commission
20 would not issue a list showing a person as available?

21 A I'm sorry, could you say that again?

22 Q Sure.

23 Under the written test procedures --

24 A Okay.

25 Q -- and the jobs to which they apply --

1 A Okay.

2 Q -- isn't it correct that the Commission
3 would not issue a list, but for people who had taken
4 the exam, the exam had been graded, and a ranking had
5 been established?

6 A They would not issue a list?

7 You mean a certification to an agency, you
8 mean?

9 Q Right. I apologize.

10 A certification?

11 A That's my understanding.

12 I don't know if there is anything that
13 would allow them to do that, but my understanding is
14 that an agency would get a list only of people who
15 have taken the test, passed it, and declared eligible
16 for it.

17 Q Do you have any knowledge, that intern
18 lists are treated differently; that lists would issue,
19 until people have completed every requirement?

20 A I have no such knowledge.

21 Q In your job, do you have occasion to talk
22 to people who are in the internship program, for
23 social worker?

24 A No.

25 Q As they are in it?

1 A You mean the actual participants in the
2 program?

3 Q Yes.

4 A No.

5 Q Is there any aspect of the application for
6 the intern position, wherein the applicant is asked to
7 declare his or her intentions about becoming a
8 caseworker 2?

9 Do you understand the question? Asking,
10 "Are you intending to go on and be a caseworker 2?"

11 A I don't think there is anywhere it is
12 explicitly stated, or asked of the applicant.

13 Not to my knowledge.

14 Q Do you have any data, or have you heard
15 reference to data available within the Commission, to
16 the percentage of people who complete all of the
17 requirements -- after becoming interns, complete all
18 of the requirements that would be necessary to go on
19 to be a social worker 2?

20 A No.

21 Q Have you formed any belief, based on data,
22 even anecdotal material, about the percentage of
23 interns who press on, and become caseworker 2's?

24 A No.

25 Q Which person, in the Commission, would be

1 most likely to know that, if anyone does indeed know?

2 A I honestly don't know.

3 Q Could that be Mr. Shartle?

4 A I don't know.

5 Q An official offer of a civil service job

6 can't be made until the civil service has told a

7 hiring agency that the person is available by

8 providing an appropriate list; is that right?

9 A An official offer for employment?

10 Q By the agency that's hiring, can't be made,

11 until the agency has received a certified list from

12 the Commission?

13 A That's the way it's supposed to work, yes.

14 Q So we agree, it's the way it's supposed to

15 work?

16 A Correct.

17 Q Is that how it works?

18 A To my knowledge, yeah. I don't --

19 Q Have you run into any exceptions, with the

20 intern, the social work intern program?

21 A Not professionally, no.

22 Q Have you heard of them?

23 A No.

24 Q And the same question with the county

25 caseworker position, as far as you know, have the

1 hirings only been occurring once a list has been made
2 available to the hiring authority?

3 A To my knowledge, yes.

4 You say a county caseworker; correct?

5 Q Correct.

6 A Okay.

7 Let me just qualify that.

8 And I don't know if it's for county
9 casework, that's why I am kind of hesitant about it, I
10 think I have heard about cases of emergency
11 appointments being done, but I don't know in what
12 context that would be, and it's not necessarily for
13 this class.

14 But I am not part of the group that
15 normally does that, which would be the Bureau of
16 Technical Information Systems, so I can't speak to any
17 facts about that.

18 But I have heard about emergency
19 situations. I don't know about any details, I don't
20 know how it relates to this process that we are
21 discussing, so -- but you mentioned anecdotal, so I
22 want to make sure I am clear about that.

23 Q Exactly, and I appreciate your thoroughness
24 about that.

25 Would it be correct that no one has brought

1 to your attention, nor have you accidentally bumped
2 into any information, about there being emergency
3 appointments, relative to caseworker, social worker?

4 A I can't say that with certainty, no.

5 Q So take a moment, and if you would search
6 your memory, and tell us if any example of that comes
7 to mind, where you heard of emergency appointments of
8 county social workers?

9 A I am not really sure. I am not really
10 sure.

11 Q Now, as you have explained well to us this
12 morning, and additionally some this afternoon, the
13 internship program is set up so that it fits well, if
14 it begins in the junior year, it can be, according to
15 the job announcement, either in two three-month
16 blocks, or a six-month block, depending on when the
17 student is doing it, and the availability of the
18 school, I gather.

19 A Okay.

20 Q Do you have any idea of the sorts of rule,
21 law, regulation, suggestion, prototype, model,
22 anything that causes our Pennsylvania internship
23 program to be set up that way?

24 A Do you mean --

25 Q Why is it the way it is?

1 A You mean in terms of other states, or
2 models, where we draw from?

3 Q Exactly. Where does that come from?

4 A I don't know.

5 Q You never bumped into anything at work so
6 far, that shows you the roots of it?

7 A The roots, no. You mean like the origins
8 of the initial --

9 Q Exactly.

10 A No, huh-uh.

11 I know that later intern programs are
12 somewhat patterned after ones that already exist,
13 within Pennsylvania.

14 But I don't know the origins of this
15 particular one.

16 Q Now, I assume that county agencies,
17 including Offices of Children and Youth, request of
18 the Commission lists of people who are qualified to be
19 caseworkers 1, 2 and 3. Agreed?

20 A Correct.

21 Q If a county asks for a list of caseworkers
22 1, 2 and 3, in order to facilitate hiring and
23 planning, on their purposes, for their purposes, does
24 the Commission also provide a list of interns?

25 A I'm sorry, maybe I am not sure I am

1 understanding.

2 Q If the county requests a caseworker 2
3 list --

4 A Okay.

5 Q -- will the Commission also send a list of
6 interns?

7 A You mean automatically, without the agency
8 requesting that?

9 Q Yes. Right.

10 A I would be speculating. I wouldn't think
11 so.

12 I think it would have to be a specific
13 request by the agency, but I don't know that for
14 certain.

15 Q And my theory that I am asking you to
16 ponder, is obviously the county's looking for social
17 workers.

18 A Right.

19 Q And you know of this other way that tends
20 to turn into social workers, which are the people who
21 are pursuing the internships.

22 So that it seems it would make it easier to
23 facilitate their doing then?

24 A Let me get a clarification from you, too,
25 are you talking about an agency has a vacancy, that

1 they have for a caseworker?

2 Q One or more; they may have a number.

3 A Let's just keep it simple, let's keep it to
4 one, for the moment.

5 Q Okay.

6 A They have a social caseworker they have to
7 fill right now, are you asking if they ask the
8 Commission for a caseworker 1, would they also ask for
9 an intern list at the same time?

10 Q That's a different question, but let's
11 start there.

12 A Okay.

13 Q In your experience, will OCY offices ask
14 for both lists, at the same time?

15 A I don't know.

16 Could they? Sure. But I don't know if
17 they do.

18 Q But you don't know one way or the other?

19 A I don't.

20 Q And if an agency wants to hire only one
21 person immediately, they are going to be asking for
22 the caseworker 1, 2, 3 list, because they need
23 someone who can start right away; is that right?

24 A No, not necessarily, because theoretically,
25 the other person could start right away as an intern.

1 Now, if they want someone up and running,
2 then logically you want someone who is already at the
3 point where they are county caseworker 1. But again,
4 I don't know if that actually happens that way.

5 In other words, you will get a body either
6 way. I hate to put it so bluntly, I shouldn't put it
7 that way. You will get a person in a position --

8 Q You will get a name?

9 A You will get a name, let's put it that way,
10 yeah.

11 Q Can you think of any reason it would be
12 illegal for the Commission to send both lists, if
13 asked for one, to send both the intern list and the
14 caseworker list, as the assumption, of course, is this
15 agency needs people?

16 A I can't think of any reason why.

17 Q Is there any rule, that you know of, with
18 the Commission, or practice, so it can be a rule, or a
19 practice --

20 A Okay. By the commission?

21 Q By the Commission.

22 A All right.

23 Q -- that would rule what a hiring authority
24 is to do, if it has two lists, where it could hire at
25 the same time, and has to choose between them?

1 A I have no idea.

2 Q And where that seems a potential, as in
3 this coexistence of the trainee list and the
4 caseworker list -- do you understand what I am saying,
5 that a county could have these two lists, they
6 wouldn't be the same people ranked in the Rule of 3 on
7 the list --

8 A Okay.

9 Q -- do you know of any rule that would help
10 the hiring authority know how they were to proceed,
11 which list they should hire off of?

12 A I don't.

13 Q Okay.

14 And do you know of any practice?

15 A I don't.

16 Q Did any other examples come to mind, out of
17 the job classifications, of which you are aware in
18 civil service, where there are two extremely similar
19 lists, where people have almost those same abilities,
20 or qualifications, similar to the trainee and
21 caseworker list?

22 A I am not sure of the question.

23 Q All right.

24 A moment ago we were talking about the fact
25 that the caseworker list and the trainees offer

1 people, who are in similar -- not identical, but very
2 similar positions, to start soon, and pick up tasks.

3 A Right.

4 Q Are you aware of other civil service
5 classifications, that are parallel, and come that
6 close to each other, in yielding potential hires in
7 very similar positions?

8 MS. LLOYD: Maybe i can help.

9 You, throughout the depositions, have
10 interchanged trainee and intern, and I think for
11 Civil Service Commission, those are two different
12 things.

13 THE WITNESS: They are. They are.

14 MR. TAGGERT: Great. In my own defense, I
15 have sometimes used them interchangeably.

16 MS. LLOYD: Sometimes.

17 BY MR. TAGGERT:

18 Q But that having been said, first we have
19 talked, just to recap a little bit --

20 A Okay.

21 Q -- about the fact that we have an intern
22 list, and we have caseworker list.

23 A Okay.

24 Q And, there comes a point, especially when
25 people have nearly completed their college education,

1 and their 900 plus hours, where there is a great
2 closeness in the readiness to work in the caseworker
3 position, of the people who are on the intern list,
4 and the people who are on the caseworker list.

5 Understood?

6 A Okay.

7 You say that they are roughly at the same
8 level of --

9 Q Right. So if a hiring authority needed a
10 caseworker, they might do well going to either source?

11 A So either source.

12 Okay.

13 Q Agreed, that that's possible, and that that
14 happens?

15 A I agree that that's possible.

16 Q Among the other civil service job lists,
17 are you aware of comparable pairings, where there is a
18 great similarity in the ability of people to step into
19 a position?

20 A It's kind of like mixing apples and
21 oranges.

22 Q That's what I am asking, are the others all
23 oranges, and these are only apples?

24 A Well, I know, for example, that an agency
25 could hire a human resource management trainee, which

1 is much different from the intern program.

2 But we are -- agencies typically have
3 choices on how they can hire for a typical job title,
4 not just from civil service lists, but from other
5 means as well.

6 But if they are trying to fill a specific
7 vacancy, let's say, with a human resource person,
8 someone who they want to work in human resources, they
9 could choose to it with an analyst 1, they could
10 choose to do it with a human resource management
11 trainee, who they will eventually promote, upon a
12 successful completion of the program to a 1, they can
13 promote someone who is an HR assistant 2 into an HR
14 analyst 1 position.

15 There are any number of alternatives that
16 an agency can typically have.

17 It is very hard to compare in terms of the
18 trainee and intern kinds of things. There is nothing
19 jumping at me, to answer your question, in the way in
20 which you are describing it.

21 Q Now, to make life more interesting, is
22 there also a part-time caseworker list?

23 And to help you out, that's referenced in
24 Mr. Shartle's testimony, when he and other people were
25 trying to figure out how OCY was working in Erie, some

1 people had been hired off of what the county called a
2 part-time caseworker list.

3 Do you have any familiarity with that?

4 A I don't have any familiarity with that,
5 huh-uh.

6 Q In Deposition Exhibit 1 and 21, and the
7 attachments --

8 A 1 and 21, yes.

9 Q -- is there reference to a part-time
10 caseworker list?

11 A Specifically to a part-time caseworker
12 list, you are asking?

13 Q Yes.

14 A I don't see anything there.

15 Q What would a hiring county do, if it wanted
16 someone who had been through the merit qualification
17 system of civil service, but wanted a part-time
18 worker?

19 A Well, part time opportunities, to my
20 knowledge in civil service, are very few and far
21 between.

22 However, an applicant, when they are
23 putting in their civil service application, I believe
24 can indicate if they would be willing to accept a part
25 time appointment.

1 Let me just double check that, before I --
2 yes, I am referencing Exhibit 22.

3 Q Thank you.

4 A Page 4. "What kinds of employment will you
5 accept," and one of them, one of the choices is part
6 time.

7 So theoretically, if an agency would hire,
8 or want to hire a candidate from a civil service list,
9 even if it's normally a full-time position, that they
10 normally would hire, theoretically, it would be
11 possible for them to request the same list, but only
12 individuals who indicated part time on their
13 application.

14 Q So as best you understand it, civil service
15 staff could pull together a list, only it would be
16 confined to people interested in part time?

17 A Yes.

18 Q Once a list is published, and an individual
19 is on it, can he or she change that preference,
20 contact the civil service and say, for example, "I
21 used to want to work full time, but now I only want to
22 take a part-time position"?

23 A I see no reason why not, it falls somewhat
24 under the this same category -- not somewhat, it falls
25 under the same category, as the counties, making

1 yourself available for the counties.

2 And I believe that you could change that.

3 Circumstances may change, and they may -- it might

4 necessitate a change in that.

5 Q So as long as that particular list is still

6 an active list, the person could change --

7 A As long as that person -- as long as that

8 person is -- remains active on that civil service

9 list, they could make a change like that.

10 MR. TAGGERT: If you will excuse us for a

11 moment.

12 MS. LLOYD: Yes.

13 (Recess taken.)

14 BY MR. TAGGERT:

15 Q Are you aware of any per diem list, a daily

16 employee list?

17 A I am not.

18 Q That's kept by the Civil Service

19 Commission, for any job category?

20 A Per diem list, for any job category?

21 I can only answer this very, actually,

22 vaguely, now that I think about this.

23 And I don't know if this is actually how it

24 works.

25 I know that we have proctors, that proctor

1 examinations.

2 Q Like the bar exam, that sort of thing?

3 A Well, people who proctor civil service
4 exams.

5 And the only reason I know, this is when I
6 was working back in Imagine PA, it had nothing to do
7 with my commission duties, I was dealing with
8 compensation, specifically, in that job, and I seem to
9 remember that some employees would be paid on a
10 per diem basis, and sometimes proctors, because they
11 only proctor on certain days, it is not a full-time
12 proctoring type job.

13 I don't know if there are any other things,
14 or if that even falls under the category, but I seem
15 to remember something like that.

16 Q Would it be accurate to say, that you have
17 no data indicating that there is any per diem list
18 applying to county caseworkers?

19 A You would be accurate to say I have no data
20 on that.

21 MR. TAGGERT: Well, but for any redirect
22 that may be needed, for anything that
23 Attorney Lloyd does, I have nothing further.

24 THE WITNESS: Okay.

25 MR. TAGGERT: Thank you very much, I

1 appreciate it.

2 THE WITNESS: Okay.

3 MS. LLOYD: I have a couple to clear some
4 things up.

5 EXAMINATION

6 BY MS. LLOYD:

7 Q This morning you were asked questions which
8 led to an answer, you brought up resume reviews.

9 How do you come about doing a resume
10 review; I mean, how does that get to you?

11 A Well, resume reviews is one of the typical
12 day-to-day duties that we perform, and resumes come to
13 us a number of ways.

14 One way is that an applicant simply calls
15 us, and asks, "What am I qualified to take," and we
16 will ask them to send us a copy of the resume by mail
17 or by e-mail.

18 Legislators tend to send resumes, they get
19 tons of them, and they send them to us, and they ask
20 us if we could take a look and see what the person is
21 qualified for.

22 Sometimes people bring them in on a walk-in
23 basis.

24 Sometimes we will do a presentation on a
25 community organization, and we will collect some

1 resumes from the people who attended, and let them
2 know that we will do a general evaluation of their
3 background, to suggest tests that they could take.

4 I wanted to show the staff that resumes
5 evaluations are very imprecise, it is just a means for
6 us to suggest job titles that people could qualify
7 for, it is not -- they are not official determinations
8 of eligibility for any particular job title.

9 Q And these are not official applications for
10 any test, or job title?

11 A They are not.

12 In fact, a lot of times we have to explain
13 to individuals that if they want to apply for a
14 specific job title, that they must do it through the
15 application process.

16 Sometimes people believe, that like you
17 would in private industry, that you could submit a
18 resume, and submitting that resume constitutes their
19 application for a particular job class, and we explain
20 to them that that is not the case; that if they want
21 to apply, we can tell them, "You can qualify
22 potentially, but" -- and let me rephrase that, when
23 you tell them, "You may be eligible to take the test
24 for A, B, C, D and E, and here is how you go about
25 doing that."

1 But should they decide to apply for B, C
2 and D, they must apply for each one of those through
3 the official civil service application.

4 Q So resume review is generally an informal
5 way of directing people to those job titles or
6 classifications which they might be qualified for?

7 A That's correct.

8 I mean, in the way, you could -- you can --
9 a good analogy of what we do, would be typical what
10 you might see in an employment office at the
11 JFC Temps, or something like that.

12 Q How is -- you also talked about unassembled
13 test review, or scoring.

14 How is a resume review different from an
15 unassembled test review or scoring?

16 A Well, again, a resume is reviewed very
17 broadly.

18 I will give you a typical scenario.

19 A candidate submits a resume, says, "I have
20 a bachelor's degree, and I just graduated from
21 college, I have a bachelor's agree in behavioral
22 sciences," or "psychology."

23 One of my analysts will take it, they will
24 look at the classification plan, anything under the
25 tests that are currently open on the summary of civil

1 service exams, and they will say to them, "Okay. With
2 a bachelor's degree in behavioral sciences, you can
3 qualify for a county caseworker 1, for agent care
4 manager, any other number of titles. These are the
5 application materials," and more often than not, we
6 refer them to the website now, and say, "This is where
7 you want to go, and if you decide, after reading
8 through the test announcements, that you want to
9 officially apply for any of those titles, at that
10 point you want to do an official civil service
11 application, submit that, and then get scheduled for
12 testing."

13 What you are describing, with the official
14 eligibility determination for a particular job class,
15 that is very precise for a specific class.

16 What we do is broad.

17 By the time it gets to that point, to an
18 evaluator, in the Bureau of Personnel Assessment, it
19 is very specific to a particular job class, where the
20 evaluator will be looking, using whatever tools they
21 use, to compare the person's actual qualifications to
22 the standards that are required for making -- for
23 scoring that person.

24 So what they do is completely different
25 from what we do.

1 Q So, it would be fair to say that a resume
2 review just gets the person suggestions for titles to
3 apply for, whereas an unassembled test score review
4 could result in a "you fail" or "you are on a list"?

5 A That's absolutely correct.

6 Q All right.

7 MS. LLOYD: And that's the only questions I
8 have.

9 EXAMINATION

10 BY MR. TAGGERT:

11 Q On this last point that Miss Lloyd was
12 discussing with you, in the official eligibility
13 determination, there you are looking to see if all of
14 the requirements stated in the test announcements are
15 met; is that right?

16 A That is one element, yes.

17 Q What other elements would be present, in an
18 official eligibility determination?

19 A Well, I can only speak generally to this,
20 because I don't do that, but you are going to look at
21 the -- when you are looking at something like this,
22 you are looking -- and at the evaluation guide, that I
23 described earlier, you are looking at what a person
24 is -- do they met the minimal, that means exactly
25 that, do they meet the minimum experience and training

1 requirements.

2 So if you meet the minimum experience and
3 training requirements, you are eligible for that job
4 title.

5 Now, whether or not you get a higher score,
6 depends on, you know, the quality, and length of your
7 experience, your education, and those things, that the
8 evaluators have guides; I would assume they have
9 guides in order to determine that.

10 So that you can distinguish candidate A and
11 B -- between candidates A and B, who each meet the
12 minimum requirements, but how does one get a higher
13 score than the other. Those were the additional
14 things that the evaluators would have to look at, and
15 I really don't know what those specific things are.

16 Q Isn't it correct, though, that there are --
17 you know for a fact that there are guides for this
18 kind of analysis, or review?

19 A I don't know for a fact, but they must --
20 well, I shouldn't speculate on this.

21 Q We hope they --

22 A There have to be some criteria, for them to
23 determine how to score this person.

24 I don't -- I honestly don't know what those
25 are.

1 And I am sure that they will vary from
2 title to title.

3 Q I am going to show you what was marked
4 yesterday, as Deposition Exhibit 2.

5 A Okay.

6 MS. LLOYD: That was just a little aside, I
7 was jokingly saying this is why I don't like to
8 ask questions at the end, because it always
9 generates another ten or 15 minutes.

10 But that's fine.

11 MR. TAGGERT: There is no such thing as one
12 last question.

13 MS. LLOYD: Right.

14 A Just us and Columbo.

15 Q And if you notice toward the bottom, there
16 is a code, and it references, quote, "You do not have
17 the required experience."

18 A Uh-huh.

19 Q And we talked about that from a different
20 slant yesterday.

21 A Uh-huh.

22 Q And it came out, in the discussions, that
23 Mr. Dows challenged that conclusion, by sending a
24 letter explaining why he thought the Commission might
25 be wrong on that determination.

1 A Okay.

2 Q And, the Commission employee then changed
3 that decision, and found that there was adequate
4 experience to meet that minimum requirement.

5 A Okay.

6 Q Is that an example of the sort of analysis
7 you were talking about with Miss Lloyd, of looking at
8 the material there, and then determining if basic
9 qualifications are met?

10 A Well, let me qualify that a bit.

11 Miss Lloyd's specific question was in
12 reference to the unassembled exams.

13 For the unassembled exams, which are the
14 exams for which you do not take a written, you know,
15 computerized test, those are done completely by the
16 Bureau of Personnel Assessment, who have these, I am
17 assuming these guidelines, or whatever, to do the
18 determinations.

19 For a written test, those are not
20 exclusively done by BPA, in fact, the ones that are
21 written exams, at least here in Harrisburg, are done
22 by the evaluators here in Harrisburg, and I
23 personally, and other analysts in the division, and
24 bureau, in the past, have made these kinds of
25 determinations ourselves, because these are based on

1 the evaluation guide, the person's application; there
2 are no -- the score is not an issue, at this point,
3 because it is the written, or computerized test that
4 determines that person's score.

5 So we don't have to go in that direction.

6 All we have to do at that point is
7 determine that these people are minimally qualified,
8 based on a comparison of the person's qualifications,
9 as indicated on the application, and what the
10 evaluation guide says.

11 So, we can make these determinations,
12 ourselves.

13 So it sounds like in this particular case
14 someone made a determination, based on what the
15 evaluation guide says, perhaps didn't have enough
16 information, or was misinterpreting something on the
17 actual application, and then upon receiving additional
18 information, they were able to see that they did in
19 fact meet the minimum requirements, in comparison with
20 the evaluation guide.

21 Q Thank you.

22 A Sure.

23 MR. TAGGERT: Well, sir, we have no further
24 questions. We were very thankful for you being
25 here, and for your help today.

1 THE WITNESS: Sure, no problem.

2 MS. LLOYD: Read and sign.

3 You have the options to read the

4 transcript, at a later time.

5 THE WITNESS: Okay.

6 MS. LLOYD: And make sure everything is
7 correct, and sign off on that. I will direct you
8 to do that.

9 THE WITNESS: Sure.

10 - - -

11 (Thereupon, at 2:45 o'clock p.m., the
12 deposition was concluded.)

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SIGNATURE PAGE

Karlos M. DelToro

Subscribed and sworn to before me this

_____ day of _____, 2005

Notary Public

- - -

1 CERTIFICATE

2 COMMONWEALTH OF PENNSYLVANIA,)
3) SS:
4 COUNTY OF ALLEGHENY.)

5 I, Eugene C. Forcier, do hereby certify that
6 before me, a Stenographer-Commissioner in and for the
7 Commonwealth aforesaid, personally appeared
8 KARLOS M. DelTORO, who then was by me first duly
9 cautioned and sworn to testify the truth, the whole
truth, and nothing but the truth in the taking of his
oral deposition in the cause aforesaid; that the
testimony then given by him as above set forth was by
me reduced to stenotypy in the presence of said
witness, and afterwards transcribed by means of
computer-aided transcription.

10 I do further certify that this deposition was
11 taken at the time and place in the foregoing caption
specified, and was completed without adjournment.

12 I do further certify that I am not a relative,
13 counsel or attorney of either party, or otherwise
interested in the event of this action.

14 IN WITNESS WHEREOF, I have hereunto set my hand
15 and affixed my seal of office at Pittsburgh,
16 Pennsylvania, on this 3rd day of January,
2006.

16

17

18 
Eugene C. Forcier
19 Stenographer-Commissioner

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1 I-N-D-E-X

2 EXAMINATION BY: Mr. Taggert - Page 3, 137

3 Ms. Lloyd - Page 133

4 DEPOSITION EXHIBITS: PAGE

21 - Management Directive, 580-38 22

5 22 - Letter, Martinez to Internship Candidate 80

6 w/attachment

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- - -

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<p>0</p> <p>Ocy [1] 61:15</p> <p>1</p> <p>1 [40] 20:20 21:1 22:19 24:7,20 26:7 28:24 29:18 30:21 31:3.19 55:3,9 56:6 64:20 65:7 66:5.13. 24 68:23 71:8.18 75:1.5 78:20 85:19 88:6 110:10 114:2 121:19, 22 123:8.22 124:3 128:9,12.14 129:6,8 136:3 1:32 [1] 87:16 10 [1] 41:16 10:54 [1] 87:15 1001 [1] 2:4 133 [1] 145:3 137 [1] 145:2 15 [1] 139:9 17108 [1] 2:12 17120 [1] 2:9 1990 [1] 7:20 1995 [1] 7:20 1996 [1] 7:24 1st [3] 113:1,11,21</p> <p>2</p> <p>2 [50] 10:17.20.21 11:3 29:1.18 31: 4.19 50:10 53:10,16,17 54:13.16. 20 55:3.9 56:6 64:21 65:7 66:5, 13,24 75:1,6 78:20 85:7.10.12. 17.24 86:18 107:12 108:4 110: 10 111:25 112:10.14 113:23 114: 14,21 117:8,10,19 121:19.22 122:2 123:22 128:13 139:4 2's [3] 115:6.7 117:23 2:45 [1] 142:11 2000 [1] 67:10 2002 [1] 11:12 2004 [2] 10:16 11:13 2005 [1] 67:11 21 [10] 22:15.19 24:7.20 26:7 71: 8,19 88:6 129:6,8 22 [9] 80:20 81:2.6.11 82:7 88:6 112:5 130:2 145:21 25 [1] 52:23</p> <p>3</p> <p>3 [21] 4:21 10:14.15 11:7 49:24 55:3.9 56:6 65:7 66:24 74:3 75: 1,6 78:20 110:10 112:9 121:19. 22 123:22 125:6 145:2 3's [1] 64:21 38 [1] 7:6 39 [2] 7:6,6</p> <p>4</p> <p>4 [1] 130:4</p> <p>5</p> <p>5 [2] 30:24 112:9 580-38 [1] 145:21</p> <p>6</p> <p>6 [1] 30:25</p> <p>7</p> <p>7 [5] 80:23 105:4 109:9.11.12 75 [1] 108:10</p>	<p>7th [1] 114:11</p> <p>8</p> <p>8 [5] 55:2 112:7.8.8,9 80 [1] 145:22 814-454-6655 [1] 1:22</p> <p>9</p> <p>9:00 [1] 1:18 90 [1] 41:17 900 [1] 127:1 975 [7] 85:5 111:1.6.20 112:13 113:5,15</p> <p>A</p> <p>a-f-t-e-r-n-o-o-n [1] 88:1 a.m [2] 1:18 87:15 abilities [1] 125:19 ability [1] 127:18 able [6] 42:4 44:2 79:3 80:12 106: 6 141:18 absolutely [3] 54:10 110:21 137: 5 accept [4] 44:19 84:2 129:24 130: 5 accessing [1] 42:8 accidentally [1] 120:1 accompany [1] 40:13 accomplished [1] 51:5 accordance [1] 112:1 according [2] 106:15 120:14 account [1] 49:21 accounting [1] 98:18 accumulate [1] 57:15 accumulated [1] 47:20 accurate [5] 36:22 48:23 77:4 132:16,19 accurately [3] 34:15 77:3 85:11 across [3] 18:13 26:16 27:15 action [1] 144:13 active [3] 81:20 131:6,8 activities [7] 5:25 7:2 11:15 53:5 55:22 58:25 88:10 activity [1] 101:24 actual [5] 49:3 94:24 117:1 136: 21 141:17 actually [17] 10:5,8 37:20 40:18 52:11 76:11 77:7 81:20 90:5 91: 1 101:13 105:18,20 112:5 124:4 131:21.23 add [6] 13:13 102:1.11,15 103:2. 3 added [1] 45:4 addition [3] 11:24 50:9,18 additional [3] 102:1 138:13 141: 17 additionally [1] 120:12 address [2] 84:24 95:5 addressed [1] 94:24 adequate [2] 113:7 140:3 adjournment [1] 144:11 administer [2] 20:11 25:2 administration [3] 6:18 8:22 27: 16 administrators [2] 12:16 13:5 advice [2] 67:15.16 advise [13] 27:11 63:12 65:15.18</p>	<p>66:13 68:19 94:10 95:20.22 96: 19.25 97:13 99:5 advising [3] 94:19,21 96:7 advisors [1] 97:17 affirmed [2] 3:3.7 aforesaid [2] 144:5.7 afternoon [2] 88:4 120:12 age [14] 39:1.10.23 43:3 52:23 74: 18 75:7.24 76:1.2.8 79:2 80:9.13 agencies [12] 16:25 17:5.7,9,10, 11,12 25:6 79:17 105:22 121:16 128:2 agency [35] 6:14.16 17:1.2 42:3, 4 48:13 51:3 60:15 61:19 62:13, 17 63:2.14 76:11.14 79:12.12 86: 10,25 111:13.16 116:7.14 118:7. 10.11 122:7.13.25 123:20 124: 15 127:24 128:16 130:7 agent [1] 136:3 aggregate [2] 75:16,23 aging [1] 62:17 ago [3] 41:10 56:11 125:24 agree [6] 36:14 46:1 108:17 118: 14 127:15 135:21 agreed [4] 18:18 71:4 121:19 127:13 agriculture [6] 7:14.16 8:1.5.9 74:15 ahead [4] 26:9 48:11 54:10 55:10 alcohol [1] 62:20 allegheeny [1] 144:3 allied [1] 11:2 allow [6] 19:22 39:15 67:3 75:14. 16 116:13 allowed [4] 71:3.5 103:5 105:9 allusions [1] 21:8 almost [1] 125:19 already [13] 19:8 26:21 52:7 60: 20 61:3 70:13 78:3 93:1 95:1.10 103:11 121:12 124:2 alternative [1] 50:14 alternatives [1] 128:15 among [3] 19:2 88:5 127:16 amount [1] 99:13 amounts [2] 110:4 111:21 analogous [1] 55:22 analogy [1] 135:9 analysis [4] 75:13 76:24 138:18 140:6 analyst [10] 4:21 5:16.18 10:14, 15,17,20.21 11:3.7 15:21 16:25 17:4 33:12 35:7 92:22 128:9,14 analysts [5] 16:21 90:10 92:23 93:5 135:23 140:23 and/or [1] 71:18 anecdotal [2] 117:22 119:21 announcement [10] 5:9.10 47:3. 4 58:10 80:24 81:17.23 82:13 120:15 announcements [3] 62:9 136:8 137:14 annually [1] 76:10 another [9] 6:14 21:14 50:14.17 66:1 68:25 69:6 93:6 139:9 answer [14] 3:18.19.25 17:10 38: 6 39:17 42:10 47:3 57:4 72:18</p>	<p>104:8 128:19 131:21 133:8 answered [1] 48:10 anybody [3] 5:14 68:6 96:11 anyway [2] 65:22 91:10 apologize [2] 85:13 116:9 appeal [1] 36:16 appear [1] 75:18 appearance [1] 5:5 appearances [1] 2:1 appeared [1] 144:5 appears [1] 75:17 apples [2] 127:20.23 applicant [7] 41:7 42:18 44:4 117:6.12 129:22 133:14 applicants [1] 41:19 application [25] 32:25 39:15 42: 15,23,25 51:24,25 59:25 78:8 101:16.18 106:11 109:15 112:19 117:5 129:23 130:13 134:15,19 135:3 136:5.11 141:1.9.17 applications [4] 42:1 52:4 80:5 134:9 applied [7] 78:8 103:18,22 104: 12 107:1,1 108:11 apply [27] 25:20 32:23 46:12 49: 25 52:6,8,15 66:18 70:11 71:20 79:3,6 82:6,8 101:14 103:15,23 104:9,10.17 115:25 134:13.21 135:1,2 136:9 137:3 applying [2] 88:13 132:18 appoint [1] 87:1 appointed [4] 79:14.18 108:14 111:13 appointment [1] 129:25 appointments [3] 119:11 120:3. 7 appreciate [3] 24:4 119:23 133: 1 appreciated [1] 13:12 appreciative [1] 91:9 apprentice [1] 60:14 approach [3] 94:15 100:4 106:5 approaches [1] 65:17 appropriate [7] 38:15 89:7,16,20, 22 115:14 118:8 approved [3] 59:15 60:13 86:13 approves [1] 32:6 approximately [1] 10:15 area [10] 12:4,9.13 16:20 25:18 62:17 69:10 96:9.25 98:23 areas [3] 12:11 89:2,3 aren't [2] 9:17 102:9 arising [1] 18:21 arose [1] 78:9 around [2] 12:1 17:18 arrive [1] 47:19 aside [2] 72:3 139:6 asks [3] 48:6 121:21 133:15 aspect [1] 117:5 aspects [1] 74:18 assembled [1] 43:11 assessment [8] 9:15 10:5 32:14 37:1 60:8 90:23 136:18 140:16 assigned [5] 16:25 17:4 37:10. 14 45:9 assist [1] 93:10</p>
--	---	--	--

<p>classroom [2] 94:24 98:16</p> <p>clause [1] 84:25</p> <p>clear [3] 80:22 119:22 133:3</p> <p>clearer [2] 14:7 46:6</p> <p>clerical [1] 16:22</p> <p>client [1] 3:9</p> <p>clients [2] 27:8,11</p> <p>close [1] 126:6</p> <p>closeness [1] 127:2</p> <p>closest [1] 41:21</p> <p>co-worker [1] 54:4</p> <p>co-workers [1] 16:4</p> <p>code [3] 24:17 73:6 139:16</p> <p>coexistence [1] 125:3</p> <p>collect [1] 133:25</p> <p>collectively [1] 32:16</p> <p>college [37] 8:13,14,23,24 9:3 11:6,10,11,14,21 12:22,25 13:17,23 51:19,23 52:5 53:7 62:4 63:8 65:19 66:3 70:8 71:1 83:4,7 88:22 92:24 94:8 95:18 97:17 105:25 106:21 107:5 113:19 126:25 135:21</p> <p>colleges [21] 11:16 12:1,6,13,17 14:10,14,15,17 15:20 16:10 47:9 61:23 84:8,15 88:10 90:6 91:4,22,25 94:20</p> <p>columbo [1] 139:14</p> <p>combination [1] 54:24</p> <p>come [28] 9:23 22:25 23:3,6,12,16,24,25 24:6,20 25:25 26:16 47:22,24 56:5,5 71:24 72:5 76:17 86:24 96:1,20,22 121:3 125:16 126:5 133:9,12</p> <p>comes [23] 24:7 25:19 26:2 30:1 47:25 51:8 61:12,13,16 65:20 67:5 69:18 84:20 85:5 93:6 96:5,11,14,18 100:16 115:11 120:6 126:24</p> <p>comfortable [1] 3:24</p> <p>coming [5] 45:3 47:11 65:19 89:17 95:12</p> <p>commencing [1] 1:18</p> <p>commented [2] 67:23 68:7</p> <p>commission [89] 3:12,13 4:17 6:10,11,12,15,24 7:11,22,24 8:5 9:16 10:22 11:25 15:16 18:17 23:17 24:8 26:20,23 27:1,21 28:8 31:8 34:25 35:15 37:25 38:15 40:21 41:12 43:19 46:19,21 47:5 48:16 50:4 55:25 56:8,10 57:19 58:3 59:7,17 60:6 64:19 67:3,6,23 68:5,6 72:25 74:10,18 77:20,25 78:2 79:11,12,13,13 82:4 92:13,16 98:13 105:17 107:4 113:18 114:22,23 115:18,19 116:2 117:15,25 118:12 121:18,24 122:5 123:8 124:12,18,20,21 126:11 131:19 132:7 139:24 140:2</p> <p>commissioner [1] 1:16</p> <p>committee [1] 73:20</p> <p>commonwealth [10] 1:16,17 12:2 27:9,14 61:23 72:23 93:24 144:2,5</p> <p>community [1] 133:25</p> <p>company [1] 8:11</p>	<p>comparable [2] 73:25 127:17</p> <p>compare [2] 128:17 136:21</p> <p>compared [2] 49:8 51:7</p> <p>comparing [1] 33:14</p> <p>comparison [3] 28:2 141:8,19</p> <p>compensation [6] 62:8,11,25 63:9,23 132:8</p> <p>compile [1] 5:23</p> <p>complaints [1] 56:11</p> <p>complete [5] 83:12,16,18 117:16,17</p> <p>completed [12] 46:17 106:19 107:13 108:9,20 109:8 111:6 112:23 113:15 116:19 126:25 144:11</p> <p>completely [3] 33:25 136:24 140:15</p> <p>completes [4] 85:2 108:12 111:20 112:13</p> <p>completion [3] 85:4 112:11 128:12</p> <p>composition [1] 75:14</p> <p>computer-aided [1] 144:9</p> <p>computerized [2] 140:15 141:3</p> <p>concentrate [1] 91:18</p> <p>concept [3] 26:21 27:2 63:9</p> <p>concerned [1] 30:3</p> <p>concerns [1] 74:18</p> <p>conclude [1] 42:17</p> <p>concluded [2] 35:15 142:12</p> <p>conclusion [1] 139:23</p> <p>concrete [1] 25:8</p> <p>conference [1] 73:19</p> <p>confess [1] 36:1</p> <p>confined [3] 102:18,20 130:16</p> <p>confused [1] 79:6</p> <p>consider [3] 9:15 71:22 83:22</p> <p>considered [4] 44:16 61:19 102:3 112:22</p> <p>consistent [1] 41:6</p> <p>constitute [2] 22:22 43:2</p> <p>constitutes [3] 38:13 40:14 134:18</p> <p>constructed [1] 70:16</p> <p>consultant [1] 59:21</p> <p>consultants [1] 60:3</p> <p>consultation [1] 3:15</p> <p>contact [27] 12:12,14 13:4,9 14:5,16 15:1,10,12,24 16:2 17:2,7,13,21,24 18:1,15,17,20 19:5 63:1,18 64:6 94:18 97:16 130:20</p> <p>contacts [1] 15:20</p> <p>contains [2] 34:7,15</p> <p>content [1] 81:16</p> <p>context [4] 95:8 96:15 97:24 119:12</p> <p>contingent [1] 86:6</p> <p>continually [1] 45:3</p> <p>continue [1] 68:18</p> <p>continuous [1] 91:16</p> <p>contrary [1] 63:25</p> <p>copies [1] 92:17</p> <p>copy [4] 58:9,11,11 133:16</p> <p>correct [70] 4:15 7:4 8:15 9:22 10:25 16:8 22:19,20 23:14 28:10 32:7 35:17,23 36:18 37:9,21 38:2,3 44:5 45:11 48:2,5,19 49:20 52:2,3,10 53:9,18 57:1,2 60:11 62:18 66:21 70:10,15 72:21 78:8 79:15 84:10 92:5 99:20,24,25 101:11 102:5,8,23 103:7,8 104:22 106:12,24 109:11,22 110:1,13 111:2 112:8 115:17 116:2 118:16 119:4,5,25 121:20 135:7 137:5 138:16 142:7</p> <p>correctly [3] 37:4 68:22 88:5</p> <p>correlate [2] 78:9,14</p> <p>counsel [4] 2:10 27:8 30:13 104:15</p> <p>count [1] 111:16</p> <p>counties [30] 12:9 19:5 43:11,22 44:3 66:22 67:7,17,25 68:7 69:2,3 76:24 77:1,2,23 101:9,19,24 102:1,2,6,10,11,16 103:1,3 105:2 130:25 131:1</p> <p>county [139] 5:8 16:23 17:22,25 18:3,10,21 19:2 25:20,22 28:21,23 29:1 30:25 31:18 38:9,14 41:19 42:16 43:8,15,20,23,25 44:10 46:25 48:6 49:9 50:1,5,8,13 53:9 54:13,16 55:9 57:20 58:10 60:20 61:1 62:15,23,24 63:14,17 64:3,4,20 65:21,24 66:5,9,12 67:11,18 68:1,9,12,22,23 69:9,19 75:1,5,19 77:6,13,19,19 78:1,10,19,22 80:1,25 81:21 85:7,12,25 86:16 87:9 89:13,21,25 90:22 91:7,19 95:2,14 98:14 99:18 100:14 103:4,6,8,12,19 105:4 106:3 107:21,23 108:24 109:1 110:2,11,16,19 111:5,8,14,25 112:4,9,12,14,19 113:23 114:13,14,21,23 118:24 119:4,8 120:8 121:16,21 122:2 124:3 125:5 129:1,15 132:18 136:3 144:3</p> <p>county's [1] 122:16</p> <p>couple [3] 8:4 95:5 133:3</p> <p>course [7] 8:3,25 9:2 16:24 90:13 106:13 124:14</p> <p>courses [3] 9:17 10:11,13</p> <p>court [4] 1:1 3:11 4:5 57:7</p> <p>courtesy [1] 82:21</p> <p>cover [6] 81:3,14,15 82:1,6 96:11</p> <p>covered [1] 9:24</p> <p>covering [1] 98:13</p> <p>crawford [1] 12:8</p> <p>create [3] 26:9 37:15 61:5</p> <p>created [2] 59:15 72:13</p> <p>creates [1] 37:25</p> <p>creating [1] 44:14</p> <p>credit [1] 9:3</p> <p>credits [3] 83:4,6 108:10</p> <p>criteria [1] 138:22</p> <p>current [1] 17:3</p> <p>currently [6] 4:16 16:16 40:4 70:9,23 135:25</p> <p>custom [2] 99:5,9</p>	<p>15 80:5 99:16 117:14,15,21 132:17,19</p> <p>database [1] 78:4</p> <p>date [5] 1:18 39:22 46:8 80:13 111:15</p> <p>david [2] 1:4 2:15</p> <p>day [2] 1:18 144:15</p> <p>day-to-day [1] 133:12</p> <p>days [1] 132:11</p> <p>deal [5] 12:15 19:7 23:4 96:4 98:2</p> <p>dealing [5] 19:2 21:6 74:10 95:17 132:7</p> <p>dealings [2] 13:18 14:1</p> <p>deals [2] 16:22 24:25</p> <p>dear [1] 81:14</p> <p>december [1] 7:20</p> <p>decide [5] 38:22 66:16 103:2 135:1 136:7</p> <p>decided [2] 72:7 106:4</p> <p>decision [5] 51:15 53:6 61:5 106:5 140:3</p> <p>decisions [1] 72:14</p> <p>declare [1] 117:7</p> <p>declared [2] 36:7 116:15</p> <p>deemed [1] 87:8</p> <p>defense [1] 126:14</p> <p>define [1] 78:13</p> <p>degree [14] 8:19 55:18 83:13,18,19,20 89:7 90:1 97:7,8 105:2 112:21 135:20 136:2</p> <p>deltoro [2] 3:1 4:13</p> <p>denise [1] 57:25</p> <p>department [18] 7:13,15,25 8:8 14:1 17:14,16 18:2,5,16 32:10,12 35:22 60:14 61:17 63:19 74:15 97:19</p> <p>departments [2] 14:19 47:13</p> <p>depend [2] 35:24 38:6</p> <p>dependent [4] 77:6,12,18,22</p> <p>depending [4] 46:11,22 89:7 120:16</p> <p>depends [2] 96:15 138:6</p> <p>deposed [1] 3:4</p> <p>deposition [17] 20:20 22:15,19 41:5 55:2 71:8,18 80:20 82:7 88:6 109:9 129:6 139:4 142:12 144:7,10 145:4</p> <p>depositions [2] 1:15 126:9</p> <p>derive [1] 58:19</p> <p>derived [2] 42:12 45:2</p> <p>describe [2] 21:3 24:12</p> <p>described [3] 25:5 47:10 137:23</p> <p>describing [5] 25:4 44:17 111:13 128:20 136:13</p> <p>description [2] 44:20 104:19</p> <p>detail [1] 30:10</p> <p>detailed [2] 30:12 32:25</p> <p>details [2] 63:12 119:19</p> <p>determination [9] 33:12,19 36:6,13 136:14 137:13,18 139:25 141:14</p> <p>determinations [4] 134:7 140:18,25 141:11</p> <p>determine [11] 34:24,25 57:3 78:11 79:2 80:5,9,12 138:9,23 141:15 75:6 76:21 77:4,15 78:3,11.</p>
--	--	--

83:17 84:5 90:5 97:5,9 fields [2] 40:11 44:3 figure [4] 20:18 35:22 67:3 128:25 filed [1] 29:10 files [1] 5:4 fill [5] 41:8 64:21 109:14 123:7 128:6 filled [3] 39:20 80:11 113:25 fills [3] 40:8 106:10 108:23 final [3] 59:19 75:15,21 finally [2] 32:6 59:15 find [5] 42:8 57:10 62:25 63:4,17 finds [1] 51:9 fine [3] 54:4 71:14 139:10 finish [1] 105:10 finished [1] 114:7 finishing [1] 113:4 firms [1] 60:3 first [15] 3:3 10:21 13:1 27:2 36:3, 5 53:7 85:8 90:12 107:20 108:6, 9,13,20 126:18 fit [2] 29:13 51:17 fits [2] 48:22 120:13 flagging [1] 100:2 flaw [1] 76:23 flexibility [2] 102:1 105:3 flexible [1] 101:21 flows [1] 61:16 fluid [2] 44:24 45:6 flyer [3] 5:10 14:13 58:11 flyers [1] 14:9 focus [1] 96:9 folks [1] 96:6 follow [3] 47:7 60:9 72:17 following [1] 13:6 follows [1] 3:4 force [2] 4:23 75:13 forcier [2] 144:4,18 forget [1] 29:23 form [8] 32:25 37:2 40:1,8,13,19 72:11 101:16 formal [5] 8:21 36:17,18 55:8 93:18 format [1] 71:8 formats [1] 57:17 formed [2] 41:24 117:21 forth [1] 88:14 found [2] 111:11 140:3 foundation [1] 26:7 four [3] 14:14 91:25 102:25 fraction [1] 41:15 frame [2] 76:16,17 frankly [1] 91:13 fred [1] 5:17 frederick [1] 2:10 free [1] 107:17 frequently [1] 30:2 freshman [1] 89:18 friendliness [1] 82:23 friends [1] 95:12 front [4] 22:18 24:6 26:8 81:24 full [3] 4:11 96:7 130:21 full-time [5] 53:7 84:23 112:21 130:9 132:11 functional [1] 4:22	functions [1] 11:20 funding [4] 17:17 61:12,15,19 further [4] 132:23 141:23 144:10,12 future [2] 93:24 101:7 <hr/> G <hr/> gamut [1] 96:8 gannon [1] 15:1 gantverg [1] 1:21 gather [1] 120:18 gave [2] 29:3 112:2 gender [5] 39:1,8 40:2 74:21 75:6 general [21] 2:7 4:21 13:19 15:6 17:25 18:22 20:11 26:9 27:24 28:13 33:1 37:18 43:21 61:11 63:8,10 68:12 81:16 96:3 99:12 134:2 generally [15] 11:23 19:15 28:5,8 36:3 52:5 62:7,12,22 63:3 69:8 87:4 100:1 135:4 137:19 generates [1] 139:9 gentleman [1] 19:8 gets [9] 35:24 46:5,7 48:24 77:10 99:7 107:1 136:17 137:2 getting [5] 53:25 69:8 79:6 83:6 110:25 give [25] 25:7 51:5 63:6 66:1,7,9,15 70:18 76:14,14,20 78:16 79:16 82:12,13 90:11 91:6 94:2 96:10 97:1 99:11 103:5,11 106:15 135:18 given [9] 46:8 59:11 61:4 67:11,16 90:4 93:13,18 108:2 gives [1] 99:16 giving [3] 80:18 94:23 99:2 goal [1] 99:3 got [3] 14:22 98:22 113:12 gotten [2] 108:12 111:11 government [7] 9:11 17:25 18:3 27:10 61:16 63:2,17 governments [1] 16:23 governor's [5] 6:18 23:12 24:19,24 73:20 grab [1] 100:20 grade [6] 35:14 37:10 38:22 48:1,3 106:16 graded [3] 109:19 115:19 116:4 graduate [8] 8:16 70:25 71:2 89:24 105:10 112:15 113:1,11 graduated [4] 106:21 113:19 114:10 135:20 graduates [2] 66:4 88:23 graduation [2] 84:24 105:11 great [4] 105:2 126:14 127:1,18 group [6] 17:13 47:21 94:19 98:5,6 119:14 groups [2] 98:9,10 guess [7] 4:5 33:21 35:8,8 37:17 110:14,14 guidance [10] 19:24 20:8,11 21:6,11 23:16 24:9 34:18 36:25 72:12 guidances [1] 25:25 guide [17] 5:8 28:3,20 32:7 33:24 34:2,8,18 35:7 37:2,5 93:22 137:22 141:1,10,15,20	guidelines [2] 25:14 140:17 guides [12] 27:25 28:9,15 29:9,17 30:12 31:2,9,15 138:8,9,17 <hr/> H <hr/> hand [1] 144:14 handle [2] 92:20 93:14 handled [1] 35:21 handling [2] 25:6 93:9 hang [1] 66:18 happen [1] 103:1 happens [3] 87:4 124:4 127:14 happy [1] 97:14 hard [3] 42:10 45:16 128:17 harrisburg [5] 2:9,12 15:17 140:21,22 hate [1] 124:6 head [5] 4:4 54:5,15 70:1 115:15 health [3] 11:2 74:3 91:8 heard [7] 13:10 87:10 117:14 118:22 119:10,18 120:7 hearing [1] 79:9 help [11] 5:22 34:24,24 35:7 37:3 45:19 112:7 125:9 126:8 128:23 141:25 helped [1] 57:3 hereby [1] 144:4 hereinafter [1] 3:3 hereunto [1] 144:14 hesitant [2] 44:18 119:9 hesitating [2] 13:9 24:22 hesitation [2] 31:22,23 higher [2] 138:5,12 hire [10] 50:19 79:17 123:20 124:24 125:11 127:25 128:3 130:7,8,10 hired [12] 74:22 77:5 78:1,12,19 79:24 80:6 107:7,11,22 110:20 129:1 hires [7] 74:25 75:7,8 77:18 79:4,6 126:6 hiring [12] 74:11,19 79:3 103:5 118:7,10 119:2 121:22 124:23 125:10 127:9 129:15 hirings [1] 119:1 historically [1] 90:9 hodge [1] 1:21 home [1] 114:23 honestly [7] 58:13 80:13 104:1 105:23 114:18 118:2 138:24 hope [3] 53:25 88:12 138:21 hostility [1] 10:11 hours [11] 85:5 86:6 111:1,6,17,17,20 112:13 113:5,15 127:1 however [2] 111:18 129:22 hr [6] 9:18,19,25 10:9 11:7 63:19 128:13,13 huh-uh [3] 16:19 121:10 129:5 human [10] 4:20 6:20 7:17 8:6 9:1,6,13 24:23 25:11,13 50:19 51:4 59:7 74:4 127:25 128:7,8,10 hypothetical [5] 70:18 78:19 86:11 105:25 108:2 <hr/> I <hr/> i-n-d-e-x [1] 145:1 idea [5] 19:15 39:1 60:17 120:20	125:1 identical [1] 126:1 identification [2] 22:16 80:21 identified [1] 89:4 identifying [1] 40:19 ii [1] 114:21 illegal [1] 124:12 imagine [5] 6:17,19 11:5 65:3 132:6 immediately [1] 123:21 implied [1] 20:16 imprecise [1] 134:5 impression [1] 79:16 impulsively [1] 48:10 in-house [3] 9:20,22 31:7 inc [1] 1:21 incidentally [1] 58:7 include [11] 20:13 21:8 27:20 29:24 40:2,19,25 42:15,16 59:25 82:17 included [3] 22:5 27:15 74:10 includes [3] 40:10 68:6 81:3 including [4] 12:8 27:5 101:12 121:17 inclusion [1] 46:9 income [1] 89:14 indeed [1] 118:1 indicate [8] 39:12,18,22 40:2 44:3 100:5 102:6 129:24 indicated [4] 56:3 62:8 130:12 141:9 indicates [3] 41:8 104:20 105:5 indicating [5] 40:24 41:5,14 115:5 132:17 indication [1] 51:6 indirect [1] 14:4 individual [30] 19:7 34:25 35:13 40:8 41:23 42:1 43:22 48:17 49:16 51:19,22 53:10 55:16,17 70:23 79:23 80:9 82:23 83:5 85:21 86:1 96:14 102:10 105:5 107:11,13 109:14,21 113:14 130:18 individuals [9] 21:6 46:18 75:16 89:2 95:1 103:21 104:9 130:12 134:13 industry [1] 134:17 ineligible [1] 36:7 influenced [1] 29:15 informal [2] 68:11 135:4 information [29] 11:19,22 13:21 14:20 25:1 29:11 30:6,14 39:16 40:25 41:2,2 43:4 57:15 63:5 66:16 73:24 77:9,10,24 78:4,6,24 105:16 115:13 119:16 120:2 141:16,18 informed [1] 51:15 initial [2] 36:8 121:8 initially [3] 51:8 102:6,25 initials [1] 34:10 inputting [1] 42:9 instance [4] 28:17 38:8 95:25 100:19 instead [2] 3:22 88:15 institution [1] 8:16 instructions [4] 47:2,4,7 90:3 instrument [3] 59:15,20,22
---	---	---	--

memory [3] 12:23 55:1 120:6	N	24 73:13 95:22 97:20.21 98:8 116:21	opinions [1] 59:21
men's [1] 4:7	n-e-e-d-h-a-m [1] 4:25	occupational [2] 89:3.8	opportunities [1] 129:19
mental [1] 91:8	name [10] 3:8 4:11.13 39:1,6 57:22 64:8 114:24 124:8.9	occur [1] 105:11	opportunity [5] 36:9 39:18 56:10,25 66:2
mention [1] 23:8	names [1] 12:22	occurring [1] 119:1	option [10] 54:14 65:9,10,22 66:10 68:25 69:6 100:3 101:6 102:3
mentioned [10] 11:5 39:7 53:3 88:21 93:3 96:17 98:7 119:21	narrow [1] 59:10	occurs [1] 36:19	optional [1] 41:7
mentioning [1] 94:9	nature [5] 14:4 25:3 62:10 63:1 90:18	ocy [3] 110:2 123:13 128:25	options [5] 54:12 66:7 68:17 97:11 142:3
mercyhurst [2] 13:22,25	nearly [1] 126:25	offer [4] 65:22 118:5,9 125:25	oral [2] 67:16 144:7
merit [1] 129:16	necessarily [13] 9:18 14:18 39:17 44:25 65:21 68:14 80:9 85:23 91:15 96:9 98:14 119:12 123:24	offering [2] 63:13.15	orally [1] 56:1
merry [1] 97:14	necessary [3] 14:15 105:10 117:18	offers [1] 98:13	oranges [2] 127:21.23
met [15] 35:2 54:20 55:22 58:17 84:13.17 85:22 86:15 108:8 112:22 114:20,24 137:15.24 140:9	need [19] 3:15 4:6 6:4 25:10 29:15 31:13.14 59:11 63:1 78:9 86:19 88:7 90:12 96:6 99:17 101:15 103:2 104:17 123:22	office [22] 2:11 6:7,18 17:22 21:19 23:13 24:19.24.25 29:20 59:16 62:19.20 63:4,18 64:4.11 92:3,10 108:24 114:11 135:10	order [13] 10:6 27:7,8 37:15 38:20 53:12 83:12,18 92:14 107:20 112:22 121:22 138:9
met's [2] 34:7,8	needed [5] 25:1 78:23 114:6 127:9 132:22	officers [2] 90:6 94:20	ordinary [1] 106:12
method [5] 104:24.25 105:6 106:7,7	necessitate [1] 131:4	offices [6] 17:18 47:12.12 91:4 121:17 123:13	organization [1] 133:25
might [18] 18:9 40:19 65:15 69:24 72:2 73:18 82:6.8 83:24 88:11,17 94:20 97:6 127:10 131:3 135:6.10 139:24	need [19] 3:15 4:6 6:4 25:10 29:15 31:13.14 59:11 63:1 78:9 86:19 88:7 90:12 96:6 99:17 101:15 103:2 104:17 123:22	official [1] 4:20 33:18 118:5.9 134:7.9 135:3 136:10.13 137:12,18	organized [1] 95:6
mind [16] 9:23 22:25 23:4.6.24.25 24:6.20 25:19 26:1.2 67:5 84:20 96:1 120:7 125:16	needed [5] 25:1 78:23 114:6 127:9 132:22	officially [3] 111:13 113:19 136:9	original [2] 29:14 112:19
minimal [2] 34:19 137:24	needham [1] 4:25	often [2] 93:6 136:5	originally [3] 36:5 72:7.13
minimally [1] 141:7	needham's [1] 5:1	okay [106] 3:21 4:1,2.9.10 10:19 18:7.14 19:19 20:4.6.21 21:21 23:10 24:15 25:9 26:4 30:15.18,19.23 32:18 33:8 37:23 38:8,10,11.19 40:12 41:4 43:10.17 44:6,12 45:20.25 48:8 49:5,15 54:6,25 55:4.6 56:2.18.19 58:2.5 64:2 65:2.5.23 70:19 72:4.4 74:8 78:21 79:25 80:16.19 81:5.7,9 95:19,21 106:2.9.25 107:6.19 108:18.22 109:4,7 110:3.12.20.22.24 113:3.6.9.24 114:4.12 115:24 116:1 119:6 120:19 122:4 123:5,12 124:20 125:8.13 126:20.23 127:6.12 132:24 133:2 136:1 139:5 140:1.5 142:5	origins [2] 121:7.14
minimum [18] 31:24 33:15 34:11.15 35:12 53:13 54:12.22 107:23 108:15 112:3.10 113:4 137:25 138:2,12 140:4 141:19	new [7] 8:10.14 44:14 45:2.4.23 94:2	officially [3] 111:13 113:19 136:9	other [70] 14:23 23:3,15,24 24:5,6,20 25:25 27:20 37:7.14 39:7 41:6 42:23.25 46:13 48:22 49:8 50:18 54:18 57:17 58:25 61:3.4 66:14 67:19,20 68:15 69:19 70:2 73:14.15 72:74:1 76:8 77:2 81:23 85:25 88:5 89:15 90:4 92:23 93:10.14 94:14.15 97:18,22,22 98:1,2 100:4 101:6 109:15 121:1 122:19 123:18,25 124:5 125:16 126:4.6 127:16 128:4.24 132:13 136:4 137:17 138:13 140:23
minute [1] 41:10	next [4] 30:11 46:3 66:18 105:24	officially [3] 111:13 113:19 136:9	others [3] 22:24 28:13 127:22
minutes [2] 30:11 139:9	nodder [1] 54:5	officially [3] 111:13 113:19 136:9	otherwise [2] 26:6 46:20
misinformation [1] 63:6	non [2] 32:20.21	officially [3] 111:13 113:19 136:9	ought [1] 101:4
misinterpreting [1] 141:16	nonassembled [4] 32:17 43:7 47:19 49:12	officially [3] 111:13 113:19 136:9	ourselves [2] 140:25 141:12
miss [12] 5:1 21:22 29:3,8.21 57:22 64:11,16 81:7 137:11 140:7,11	none [2] 22:25 23:6	officially [3] 111:13 113:19 136:9	out [36] 12:10 20:18 26:15 30:13,19 35:22 39:20 40:8.17 41:8 43:4 64:21 67:4 74:6 75:6 80:11 82:4 85:5 90:5 91:21 93:4 94:6 98:11 102:1,9 105:10 106:10 108:23 109:14 111:22 113:25 115:3 125:16 128:23.25 139:22
misstating [1] 18:12	nontraditional [1] 52:20	officially [3] 111:13 113:19 136:9	outline [1] 19:8
mixing [1] 127:20	nor [1] 120:1	officially [3] 111:13 113:19 136:9	outside [6] 23:16 24:8 25:19.24 59:21 60:3
model [1] 120:21	normal [1] 11:24	officially [3] 111:13 113:19 136:9	over [5] 6:13 41:23 67:19 68:15 69:25
models [1] 121:2	normally [4] 91:11 119:15 130:9,10	officially [3] 111:13 113:19 136:9	overall [1] 68:13
moment [9] 26:2 40:5.11 95:16 120:5 123:4 125:24 131:11	northwestern [5] 12:6.17,18,19 16:11	officially [3] 111:13 113:19 136:9	overlap [1] 45:14
money [2] 61:13 69:18	notary [1] 143:9	officially [3] 111:13 113:19 136:9	overlapping [1] 16:14
month [4] 14:12 85:2 104:21 111:18	nothing [12] 25:3.19 26:2.15 65:9 67:5 93:18 94:1.4 128:18 132:6.23	officially [3] 111:13 113:19 136:9	oversight [1] 18:3
months [4] 71:1 101:23 111:21 112:24	notice [5] 1:14 48:24 49:17 80:24 139:15	officially [3] 111:13 113:19 136:9	own [9] 25:6 41:23 42:1 83:25 84:16 88:9,9 90:14 126:14
morning [5] 26:5 47:11 94:10 120:12 133:7	notification [2] 113:13,17	officially [3] 111:13 113:19 136:9	
morse [1] 1:21	number [15] 37:13 38:12 40:22 82:16 91:22 101:9 109:12 110:7 111:17.17 113:5 123:2 128:15 133:13 136:4	officially [3] 111:13 113:19 136:9	P
most [7] 42:21 94:5 96:21 104:2,23 115:14 118:1	numbers [2] 37:14 103:18	officially [3] 111:13 113:19 136:9	p.m [2] 87:16 142:11
mostly [3] 12:14 30:24 81:3	numeral [1] 114:21	officially [3] 111:13 113:19 136:9	pa [5] 6:17.19 11:5 14:17 132:6
motivated [1] 99:17	numeric [1] 37:10	officially [3] 111:13 113:19 136:9	packet [10] 38:24 39:2 40:14 48:16 49:17 59:15 64:22 106:11.14 109:18
move [4] 71:9 85:23 86:17 107:12	numerically [1] 38:16	officially [3] 111:13 113:19 136:9	packets [4] 41:16 46:13.17 59:25
moving [1] 85:9	nursing [1] 11:2	officially [3] 111:13 113:19 136:9	page [7] 30:24 112:9 130:4 143:1 145:2.3.4
ms [20] 22:1.9.11 29:12,19 78:2.3.18.24 126:8.16 131:12 133:3.6 137:7 139:6.13 142:2.6 145:3	O	officially [3] 111:13 113:19 136:9	pages [3] 30:22 63:4.16
much [10] 11:8.9 30:10 52:9 92:22 95:1 109:18 114:16 128:1 132:25	o'clock [4] 1:18 87:15.16 142:11	officially [3] 111:13 113:19 136:9	
multiple [2] 38:20 45:12	obligated [2] 85:25 86:16	officially [3] 111:13 113:19 136:9	
must [4] 35:25 134:14 135:2 138:19	obligation [2] 86:23,25	officially [3] 111:13 113:19 136:9	
	observations [1] 104:2	officially [3] 111:13 113:19 136:9	
	obtained [1] 78:24	officially [3] 111:13 113:19 136:9	
	obviously [3] 66:9 90:14 122:16	officially [3] 111:13 113:19 136:9	
	occasion [10] 12:5.15 16:9 61:	officially [3] 111:13 113:19 136:9	

<p>14 105:24 107:10 110:15 117:9 118:24 123:10 125:22 128:19 139:12 140:11 questionnaire [4] 39:15, 19, 21, 21 questions [6] 4:4 58:16 133:7 137:7 139:8 141:24 quite [3] 56:11 91:13 93:7 quote [1] 139:16</p> <hr/> <p style="text-align: center;">R</p> <p>race [17] 39:1, 13, 19 41:20 42:15 43:3 75:21, 24 76:7, 8, 9, 24 77:4, 15 78:11 79:2 80:6 raising [1] 74:18 random [1] 28:17 ranked [2] 38:17 125:6 ranking [1] 116:4 rate [1] 63:20 rather [7] 4:4 44:19 62:1 68:8, 16 79:3 108:21 rating [1] 75:15 ratings [1] 75:22 ratio [1] 66:22 re [1] 35:8 reach [1] 111:12 read [5] 57:12 71:7, 18 142:2, 3 readiness [1] 127:2 reading [1] 136:7 ready [3] 88:7 95:9 114:3 realistic [2] 90:24 91:6 realize [1] 40:4 really [20] 16:19 26:11 35:8 40:6 48:3 60:8 61:7 63:1 66:25 67:1 70:21 90:8 93:17 94:5, 5 96:2, 15 120:9, 9 138:15 reason [8] 13:8 24:21 46:24 72:9 124:11, 16 130:23 132:5 reasonable [1] 33:21 reasons [1] 61:4 recall [9] 5:7 8:25 12:10 40:5 58: 13 68:20 70:1 80:17 88:5 recap [1] 126:19 receive [4] 27:19 49:17 113:14, 18 received [4] 9:11, 17 28:4 118:11 receives [1] 35:14 receiving [1] 141:17 recent [3] 10:4 70:7 98:19 recess [3] 22:14 87:16 131:13 recognizing [1] 52:19 recollection [1] 51:17 recommend [4] 89:13, 20, 23 96: 25 recommendation [1] 35:9 record [17] 4:12 21:3 22:12 26: 17 29:5, 7 34:9 56:21, 22, 24 57: 12 67:6 71:12, 16 80:22 87:12, 13 records [2] 29:6 105:17 recruit [1] 50:15 recruiter [6] 10:22 11:6, 10, 11 93: 4 94:2 recruiters [2] 91:1 93:25 recruiting [3] 11:14 68:13 82:5 recruitment [20] 4:23 5:11, 12, 25 11:2 16:22, 24 17:4, 8 19:5 50:17, 21 58:12, 15 69:10 81:21 92:24</p>	<p>93:9, 22 98:12 redacted [1] 39:2 redirect [1] 132:21 reduced [1] 144:8 refer [4] 17:9 62:17 63:3 136:6 reference [3] 117:15 129:9 140: 12 referenced [1] 128:23 references [1] 139:16 referencing [2] 112:5 130:2 referred [3] 14:24 15:8 62:12 referring [5] 17:10 21:11 25:17 83:24 95:4 refers [1] 82:25 reflect [2] 95:17 105:18 reform [1] 37:22 refresh [1] 55:1 regarding [3] 19:25 73:19 110: 15 regardless [1] 97:8 region [1] 74:3 regular [5] 31:13 60:2, 22 61:1 66: 5 regularly [1] 16:25 regulation [2] 73:4 120:21 regulations [1] 19:22 related [7] 9:6, 18, 25 10:1 11:20 53:11, 19 relates [2] 78:3 119:20 relations [1] 59:7 relative [7] 56:3, 7, 10, 13 74:11 120:3 144:12 rely [1] 90:14 remains [1] 131:8 remark [1] 70:2 remarks [1] 20:16 remember [8] 32:1 40:3 54:21 58:9 70:3 80:14 132:9, 15 remembered [2] 32:20 58:17 remind [1] 29:21 renewing [1] 44:14 repeat [9] 13:1 23:1 34:23 51:21 57:6, 8 68:3 71:15 75:2 rephrase [1] 134:22 report [9] 41:18 42:12, 14 55:25 75:12, 14 76:5 77:20 80:10 reported [2] 76:25 78:10 reporter [2] 4:5 57:8 reporting [1] 77:3 reports [3] 55:24 78:1, 22 representatives [1] 90:5 request [10] 35:20, 21 42:5 67:25 68:8 69:2 76:12 121:17 122:13 130:11 requested [2] 42:3 114:23 requesting [4] 44:10 66:23 67: 17 122:8 requests [4] 43:23 48:13 67:7 122:2 require [4] 71:8 84:5, 8 105:21 required [4] 83:12 90:2 136:22 139:17 requirement [14] 35:16 53:14 54: 19 55:21 72:19, 23 83:23 84:17 86:15 108:8 112:23 114:20 116: 19 140:4</p>	<p>requirements [36] 31:25 33:16 34:12, 16, 20 35:1, 2, 12 52:18 54: 13, 23 55:7, 15, 16, 17 83:13, 18 84: 3, 12 85:22 107:14, 24 108:3, 15 109:9, 16 112:4, 11, 18 117:17, 18 137:14 138:1, 3, 12 141:19 requires [3] 35:1 53:10 73:6 requiring [1] 71:19 researched [1] 27:13 resource [10] 4:20 7:17 8:6 9:13 24:23 25:11, 13 127:25 128:7, 10 resources [4] 6:20 9:1, 6 128:8 responding [2] 82:5, 19 response [4] 22:6 59:1 82:9, 15 responsibilities [1] 18:9 responsible [4] 15:21 19:2 36:2 111:16 result [3] 38:5, 16 137:4 results [6] 46:7 48:24 49:3, 17 68: 2 101:22 resume [20] 27:6, 7 33:5, 11, 22, 25 35:3, 5, 6 133:8, 9, 11, 16 134:18, 18 135:4, 14, 16, 19 137:1 resumes [4] 133:12, 18 134:1, 4 resuming [1] 88:4 retain [1] 50:15 retardation [1] 91:8 retention [4] 50:18, 23 53:3 56:3 returned [1] 11:5 returns [2] 79:12, 13 review [13] 5:4 20:25 36:9 39:25 81:7 133:10 135:4, 13, 14, 15 137: 2, 3 138:18 reviewed [17] 5:8, 24 31:12 32:3 35:18 37:11 38:15, 21, 25 46:15 47:20 48:1, 17 54:11 59:16 107:4 135:16 reviewer [8] 36:3, 5, 10, 12, 23, 24 38:25 40:15 reviewing [3] 5:7 33:5 36:2 reviews [2] 133:8, 11 rising [1] 66:17 robin [2] 15:15, 21 rolling [3] 47:21, 23 106:14 roman [1] 114:21 room [1] 4:7 roots [2] 121:6, 7 rotation [2] 25:12, 16 rough [1] 41:14 roughly [3] 85:5 111:21 127:7 route [5] 36:15 65:22 66:5, 10, 13 rule [7] 49:24 120:20 124:17, 18, 23 125:6, 9 rules [2] 111:12, 14 run [4] 27:14 60:5 87:7 118:19 running [1] 124:1 rush [1] 7:8</p> <hr/> <p style="text-align: center;">S</p> <p>s-e-s-i-o-n [1] 88:1 same [31] 13:22, 24 15:4 19:8 31: 16, 18 33:5 37:14 39:21 40:1, 1 45:13, 13 59:6 64:20 74:25 81:3, 16 84:22 92:6 103:21 118:24 123:9, 14 124:25 125:6, 19 127:7 130:11, 24, 25 sat [2] 78:5, 24</p>	<p>satisfactorily [4] 86:8, 9 87:8 114:9 saying [9] 24:11 45:15, 16 68:20 78:17 107:6 110:15 125:4 139:7 says [4] 32:7 135:19 141:10, 15 scenario [1] 135:18 schedule [1] 44:13 scheduled [2] 19:12 136:11 school [2] 16:1 120:18 school's [1] 83:13 schools [4] 13:6, 13 16:10 98:2 science [1] 89:5 sciences [4] 88:16 89:12 135:22 136:2 score [14] 48:13, 18, 20 49:7 106: 17, 18 107:2 108:12 137:3 138:5, 13, 23 141:2, 4 scoring [3] 135:13, 15 136:23 scrapped [1] 45:2 screening [1] 8:11 search [1] 120:5 seasoned [2] 35:8, 9 second [8] 8:2 36:10, 12 45:23 48:9 75:25 91:24 105:11 secrets [1] 20:17 section [4] 1:17 2:8 18:2 89:6 security [1] 8:11 see [29] 11:12 12:22 29:14 31:22 33:22 34:21 39:25 40:7, 15 42:10, 14 48:12 50:20 54:21 60:7 67:11 75:14, 17 76:21 79:5 96:12 99:6 109:5 129:14 130:23 133:20 135: 10 137:13 141:18 seed [1] 100:17 seeing [2] 82:7 101:24 seem [3] 91:9 132:8, 14 seems [3] 66:22 122:22 125:2 seen [7] 40:17, 24 41:18, 21 74:21 75:6 103:17 segments [1] 107:16 semester [5] 97:25 108:7, 9, 13, 20 send [11] 14:9, 13 47:7 82:19, 20 122:5 124:12, 13 133:16, 18, 19 sending [2] 82:3 139:23 senior [13] 52:6 66:8 70:8, 20 96: 13 99:24 100:22, 23 104:4, 13 108:20 110:13 113:2 seniors [8] 52:5, 12, 14 66:12 88: 20 99:4 sense [7] 41:24 52:25 67:20 91:6 99:16 100:13 101:3 sent [8] 46:18 91:4, 21, 23 107:3 114:1 separate [3] 33:25 43:4 76:5 separately [1] 76:2 series [1] 90:22 serve [1] 17:6 service [75] 1:7 3:12 4:17 7:2, 22 9:6, 21 10:1 11:18, 22 16:1 18:17, 21 19:16, 17 21:7 22:23 23:17 26: 22 35:14 37:16 39:15 44:15 48: 25 50:19 51:4, 5, 13 56:4 58:3 59: 17 73:14 77:10 88:13, 19 90:4 96: 8 99:13 100:16, 21, 24 101:1, 4, 15, 16, 18 102:12 106:11 107:4, 25</p>
---	---	---	--

<p>135:25 thankful ^[1] 141:24 themselves ^[1] 49:10 theoretically ^[3] 123:24 130:7, 10 theory ^[3] 50:20 99:1 122:15 therein ^[2] 107:10 109:3 thereupon ^[4] 22:15 80:20 87:15 142:11 thinking ^[2] 93:23 102:25 third ^[1] 82:25 thoroughness ^[1] 119:23 though ^[3] 52:11 107:9 138:16 three ^[4] 46:11 89:1 102:25 103:3 three-month ^[8] 104:21,25 105:6,6.11 106:7 111:18 120:15 throughout ^[5] 14:10.17 92:1 102:4 126:9 throw ^[1] 12:21 timely ^[2] 77:3 114:2 title ^[20] 4:19,20.22 5:1 6:1 14:11.13 27:15 33:20 45:13,22 48:7 59:16.20 60:18 61:6 67:13 78:2 89:15 91:7 102:12 128:3 134:8.10.14 138:4 139:2.2 titles ^[19] 27:15 30:20,22 31:25 32:23 38:1.1 40:22.22 60:13 75:5 88:25 96:8 97:7 134:6 135:5 136:4.9 137:2 today ^[13] 3:9.15.17 5:5.14 6:5 19:11 20:17 23:7 30:24 61:21 80:15 141:25 together ^[6] 20:7 22:21 56:13 58:9.14 130:15 tons ^[1] 133:19 took ^[4] 10:4 35:18 37:14 57:14 tool ^[5] 50:17.18.21 53:4 91:11 tools ^[2] 96:10 136:20 top ^[1] 54:15 total ^[1] 22:22 touch ^[1] 63:13 toward ^[4] 30:25 82:23 110:25 139:15 track ^[3] 48:9 109:24 111:17 tracked ^[2] 76:3 115:5 traditional ^[1] 113:1 trainee ^[36] 19:16.21 21:7.9.9 22:23 23:4.18.19.22 24:24 25:11.13.15 26:22 27:2.15.17.22.23 28:5 37:15.18 38:1.7 48:7 60:12 66:23 70:22 85:10 125:3.20 126:10 127:25 128:11.18 trainees ^[6] 19:17 23:23 37:25 53:24 61:25 125:25 training ^[32] 8:21 9:5.12.14.17 10:4.8.8 24:13 25:14 26:9 27:19 28:4 31:25 33:14.15.16 34:11.16.20 35:12 54:12.23 73:10.13 94:6 108:15 110:5 112:3.10 137:25 138:3 transcript ^[1] 142:4 transcription ^[1] 144:9 treated ^[1] 116:18 trips ^[1] 91:2 true ^[7] 49:11 62:23 83:8 93:2</p>	<p>102:12 103:8.10 truth ^[1] 144:6 try ^[4] 91:6 94:12 96:10 104:15 trying ^[3] 20:17 128:6.25 turn ^[3] 3:16 34:21 122:20 turning ^[1] 43:8 two ^[20] 10:23 14:15 22:21 42:13 45:7 46:10 93:8 103:2 104:21 105:6.25 106:7 107:16 108:3 111:18 120:15 124:24 125:5.18 126:11 type ^[9] 10:13 38:6 51:7 60:24 62:8 93:22 94:6 111:22 132:12 types ^[1] 96:3 typical ^[10] 5:25 16:2 27:4 45:7 63:20 81:25 128:3 133:11 135:9.18 typically ^[23] 9:22 12:3 14:9 16:21 36:14 46:10.23 49:6 55:18 63:22 65:17 81:18 83:6 88:14.21 91:20 92:2 94:24 97:1 98:11 104:6 128:2.16</p> <p style="text-align: center;">U</p> <p>u.s. ^[2] 56:9 60:14 un ^[1] 32:21 unassembled ^[14] 32:19 33:6 37:9.15 38:13.21.24 40:14 43:2 135:12.15 137:3 140:12.13 unaware ^[1] 59:13 under ^[13] 17:3 52:23 56:6 63:17 89:8 109:9 111:14 115:4.23 130:24.25 132:14 135:24 underclassman ^[1] 89:18 understand ^[15] 3:18.23 11:8 19:25 25:8 27:21 45:18 63:7 64:24 96:7 97:3 99:11 117:9 125:4 130:14 understandable ^[1] 30:5 understanding ^[17] 21:4 29:9 34:4 37:24 46:4 48:15 50:8 61:9.11 68:21 72:10 103:4.13 105:13 116:11.13 122:1 understood ^[3] 3:20 32:5 127:5 undoubtedly ^[1] 52:13 unified ^[1] 44:7 unit ^[5] 15:11 18:8.24 19:1 115:15 united ^[1] 1:1 universities ^[9] 12:13 15:20 16:10 47:10 61:23 88:11 90:7 91:22 92:1 university ^[5] 13:7 15:2.5.24 95:5 unless ^[3] 26:6 80:10 91:16 until ^[15] 3:24 11:7.12 48:6.13 54:20 100:22.23 109:12 114:20.24 115:18 116:19 118:6.11 up ^[22] 14:12 30:1.16 32:16 43:3 47:11 48:1 58:23 81:24 93:8.10 95:13 96:18 97:24 101:18 103:17 120:13.23 124:1 126:2 133:4.8 uses ^[1] 105:5 using ^[7] 36:19 37:17 55:25 59:10.24 84:1 136:20</p>	<p style="text-align: center;">V</p> <p>vacancy ^[2] 122:25 128:7 vaguely ^[2] 57:11 131:22 validation ^[1] 59:9 valuable ^[1] 83:1 varies ^[1] 44:22 various ^[9] 9:5 13:13 20:11 30:20 52:19 54:12 55:22 56:8 95:17 vary ^[1] 139:1 venango ^[1] 12:8 verb ^[1] 78:15 versus ^[3] 56:5 66:23 67:18 veterans ^[2] 49:21 103:14 video ^[2] 90:21.25 videos ^[1] 91:15 videotapes ^[1] 90:18 views ^[1] 67:24 visit ^[2] 11:16 15:25 visits ^[3] 91:20 97:24 98:2 vs ^[1] 1:6</p> <p style="text-align: center;">W</p> <p>w/attachment ^[1] 145:6 wait ^[3] 100:19.22.23 waiting ^[1] 101:23 walk-in ^[1] 133:22 walking ^[1] 81:25 wanted ^[6] 18:12 80:4 108:1 129:15.17 134:4 wants ^[3] 106:3 113:22 123:20 waste ^[1] 66:14 wasting ^[1] 104:12 water ^[1] 4:7 way ^[42] 13:19.24 19:4 29:10 36:17 45:12 46:6 47:3 63:10 65:16 70:17.22 71:4.4 72:15.20.24.25 73:8 76:22 79:10 80:12 86:17 97:14 101:15 106:8.14 111:23 118:13.14 120:23.25 122:19 123:18 124:4.6.7.9 128:19 133:14 135:5.8 ways ^[4] 50:19 86:10 99:3 133:13 website ^[1] 136:6 welfare ^[6] 17:14.17 18:3.5.17 61:17 western ^[1] 1:2 whatever ^[9] 19:22 22:4 78:3 89:19 96:10 114:5.6 136:20 140:17 whenever ^[2] 34:9 64:22 whereas ^[1] 137:3 wherein ^[1] 117:6 whereof ^[1] 144:14 whether ^[13] 33:19.19 35:23 51:6.16 59:22 61:24 83:22 86:7 96:12 101:16.17 138:5 whoever ^[1] 110:9 whole ^[1] 144:6 whom ^[1] 57:24 wide ^[1] 88:24 will ^[89] 3:19.23 4:8 7:6 11:9 12:21 14:6.9 16:3 17:1.6 19:12 20:7 25:10.11 29:23 30:11.12.13 32:8 35:24 36:9 39:17 41:19 42:14.15.16 45:6.17.18 46:6.9 48:1 49:6.7.17.21 62:6 66:15 71:16 72:3 75:14.16.21.24.25 79:13 83:12 88:7.</p>	<p>15 89:6.6.8 96:11.22 98:23 100:10 105:9 106:13 111:5.24 112:7 113:11.25 114:5.15.17.22.23 122:5 123:13 124:5.7.8.9 128:11 130:4 131:10 133:16.24.25 134:2 135:18.23.23 136:1.20 139:1 142:7 william ^[2] 2:3 3:8 willing ^[1] 129:24 wind ^[3] 30:16 47:11 48:1 wish ^[1] 102:7 within ^[10] 10:10 50:3 55:24 59:17 64:19 74:17 90:20 111:11 117:15 121:13 without ^[7] 54:16 71:21 72:9 85:7.9 122:7 144:11 witness ^[14] 1:14 3:2 7:9 21:22 56:15.18 71:14 126:13 132:24 133:2 142:1.5.9 144:14 wood ^[2] 57:25.25 word ^[5] 23:22 35:9 36:20 72:3 86:22 words ^[8] 54:18 77:2 81:23 85:25 94:14 97:18 100:4 124:5 work ^[61] 3:23 4:16.23 7:12 8:6.25 9:2 12:16 13:25 14:2 15:16 16:9 19:11.15 20:7 27:22 30:13 41:23 51:4.5.7.9.13 52:17 53:5.11.11 54:2.17 65:4 74:9.10.15 75:13 83:1.20 84:8.11 86:13 88:16 94:23 95:7 97:17.19 98:3.10.20 100:21 101:15.20 102:7 103:17 113:7.15 118:13.15.20 121:5 127:2 128:8 130:21 worked ^[6] 7:11.13 8:4.8.10 90:15 worker ^[8] 82:4 89:15 106:4 113:23 116:23 117:19 120:3 129:18 workers ^[4] 13:11 120:8 122:17.20 working ^[16] 4:22 11:2 43:25 47:9 62:13 63:3.18 68:5 92:23 101:9 102:9 110:23.25 114:14 128:25 132:6 works ^[5] 5:16 20:18 51:4 83:10 111:21 114:13 118:17 131:24 worry ^[1] 30:16 worth ^[1] 108:10 write ^[1] 29:20 writing ^[3] 10:10 25:25 57:17 written ^[12] 6:2 32:24 50:9 64:20 67:16 93:12 115:18.23 140:14.19.21 141:3</p> <p style="text-align: center;">Y</p> <p>year ^[32] 6:14 14:14.15 15:25 16:3.3 45:7 46:10 52:6.10 66:18 89:18.19 90:20 91:25 94:25 95:6.10 99:24 100:9.22.23 104:4.4.13.16 106:6 108:7.9.13 113:2 120:14 years ^[7] 6:13 7:3 31:16 41:24 45:7 46:11.11 yesterday ^[7] 20:19 32:15 37:21 49:25 54:5 139:4.20 yielding ^[1] 126:6 york ^[2] 8:10.14 yourself ^[6] 20:24 81:11 92:21</p>
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